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U.S. DISTRICT COURT E.D.N.Y.

PW:CP
F. # 2005R00135/OCDETF # NYNYE-399H

★ JUN 06 2008 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

RUSSELL ALLEN,
also known as "Les,"

**S U P E R S E D I N G
I N F O R M A T I O N**

Cr. No. 04-963 (S-8) (FB)
(T. 18, U.S.C., §§
1962 (c), 1963 and 3551
et seq.)

Defendant.

- - - - - X

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION TO ALL COUNTS

At all times relevant to this Superseding Information,
unless otherwise indicated:

The Enterprise

1. The defendant RUSSELL ALLEN, also known as "Les," together with others, was an associate of a criminal organization, referred to in this Superseding Information as the "McGriff Enterprise" or the "enterprise," whose members and associates engaged in acts of murder, narcotics trafficking and money laundering. The McGriff Enterprise operated in Queens, New York, Baltimore, Maryland and elsewhere.

2. The McGriff Enterprise, including its leadership, membership and associates, constituted an "enterprise" as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an

ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise engaged in, and its activities affected, interstate commerce.

The Purposes of the Enterprise

3. The principal objective of the McGriff Enterprise was to generate money for its members and associates through their commission of crimes, including murder, conspiracy to murder, narcotics sales and money laundering. The members and associates of the McGriff Enterprise also furthered the enterprise's criminal activities by intimidating and threatening to use physical violence against others to dissuade them from cooperating with law enforcement.

The Defendant

4. The defendant RUSSELL ALLEN, also known as "Les," was an associate of the McGriff Enterprise who committed acts of violence on behalf of the McGriff Enterprise. The defendant ALLEN participated in unlawful activities in furtherance of the conduct of the enterprise's affairs.

Means and Methods of the Enterprise

5. Among the means and methods by which the members and associates of the McGriff Enterprise conducted and participated in the affairs of the enterprise were the following:

a. Engaging in acts of narcotics trafficking including the transportation and sale of cocaine base, cocaine and heroin in New York, Maryland and elsewhere;

b. Laundering the proceeds of the enterprise's narcotics trafficking; and

c. Committing, attempting to commit and threatening to commit acts of violence, including murder.

COUNT
(Racketeering)

6. The allegations contained in paragraphs 1 through 5 are realleged and incorporated as if fully set forth in this paragraph.

7. In or about and between May 2001 and November 2001, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RUSSELL ALLEN, also known as "Les," together with others, being a person employed by and associated with the McGriff Enterprise, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of the racketeering acts set forth below.

RACKETEERING ACT ONE

(Murder of Eric Smith, also known as "E. Money Bags")

8. On or about July 16, 2001, within the Eastern District of New York, the defendant RUSSELL ALLEN, together with others, with intent to cause the death of Eric Smith, also known as "E. Money Bags," caused his death, in violation of New York Penal Law Sections 125.25(1) and 20.00.

RACKETEERING ACT TWO

(Conspiracy to Murder Troy Singleton)

9. On or about and between July 1, 2001 and October 28, 2001, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RUSSELL ALLEN, together with others, did knowingly and intentionally conspire to cause the death of Troy Singleton, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1962(c), 1963 and 3551 et seq.)

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. Q.136